

## **REMARKS**

In the Official Action mailed on **April 22, 2005** the Examiner reviewed Claims 31-54. Claim 31 is objected to because of informalities. Claims 31-33, 35-40, 42-47, and 49-54 were rejected under 35 U.S.C. §102(e) as being anticipated by Pierrat et al (USPN 6,665,856, hereinafter "Pierrat"). Claims 31, 34, 38, 41, 45, 48, and 52-54 were rejected under 35 U.S.C. §102(e) as being anticipated by Lippincott et al (USPN 6,574,784, hereinafter "Lippincott").

### **Objections to the claims**

Claim 31 is objected to because of informalities.

Applicant has amended claim 31 to correct the informalities noted by the Examiner. No new matter has been added.

### **Rejections under 35 U.S.C. §102(e)**

Independent claims 31, 38, 45, and 52-54 were rejected as being anticipated by Pierrat. Independent claims 31, 38, 45, and 52-54 were rejected under 35 U.S.C. §102(e) as being anticipated by Lippincott. Applicant respectfully points out that Pierrat teaches techniques for **forming a fabrication layout** (see Pierrat, Abstract), and Lippincott teaches **modifying the geometries** of a polygon during OPC (see Lippincott, Abstract).

In contrast, the present invention **controls the ripple** caused by OPC by breaking the given segment into multiple segments (see page 11, line 16 to page 12, line 20 of the instant application). This is advantageous because the ripple can cause variations in the critical dimensions to be excessive, which creates areas that are out of tolerance. There is nothing within Pierrat or Lippincott, either explicit or implicit, which suggests controlling the ripple caused by OPC by adjusting the bias of a given segment based upon multiple deviations at multiple evaluation points.


Accordingly, Applicant has amended independent claims 31, 38, 45, and 52-54 to clarify that the present invention controls the rippling caused by OPC based on multiple deviations of multiple segments by breaking the given segment into multiple segments. These amendments find support on page 10, line 24 to page 11, line 1 of the instant application.

Hence, Applicant respectfully submits that independent claims 31, 38, 45, and 52-54 as presently amended are in condition for allowance. Applicant also submits that claims 32-37, which depend upon claim 31, claims 39-44, which depend upon claim 38, and claims 46-51, which depend upon claim 45, are for the same reasons in condition for allowance and for reasons of the unique combinations recited in such claims.

**CONCLUSION**

It is submitted that the present application is presently in form for allowance. Such action is respectfully requested.

Respectfully submitted,

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